SMETA
powered by Sedex

Sedex Members Ethical Trade Audit Report

Version 7

Sedex, 5 Old Bailey, London, EC4M 7BA, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

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Findings →

Audit details

Site details

Sedex site reference	ZS1089008	**Site name**	Klash Textile (Private) Limited
Business name	Klash Clothing Co. Ltd.	**Site address**	38000 196 R.B East Ghona Dry Port Road, Faisalabad, PK

Audit details

Sedex company reference	ZC1012455	**Auditor company name**	GCL International
Audit company address	1, St Mark Street, London, London, GB, E1 8DA		
Date of audit	2025-07-25	**Audit conducted by**	Syeda Zainab Abbas
Audit pillars	Labour Standards | Health and safety		

Time in and out	Day 1		Day 2	
	In	09:17	In	09:15
	Out	17:52	Out	14:12

Audit type	Periodic
Was the audit announced?	Semi announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Mr. Muhammad Asif / Deputy Manager Compliance

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Findings →

Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No

Reason for absence at the opening meeting	There is no registered union in the facility; however, a Worker Management Council is in place as an alternative.
Reason for absence during the audit	There is no registered union in the facility; however, a Worker Management Council is in place as an alternative.
Reason for absence at the closing meeting	There is no registered union in the facility; however, a Worker Management Council is in place as an alternative.

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	The window period for this semi announce audit is Jul 16, 2025 - Aug 5, 2025

Lead auditor	Syeda Zainab Abbas	**APSCA Number**	32200459
Additional auditor	Zubair Ahmed	**APSCA Number**	32400804
Date of declaration	2025-07-26		

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Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mr. Muhammad Asif
Title	Deputy Manager Compliance
Date of declaration	2025-07-26

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Base code	NC ZAF601040311
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601040305
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601040307
	3.L Implement effective processes to manage f...	Local law Base code	NC ZAF601040308
	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC ZAF601040309
	3.O Implement an appropriate electrical safet...	Local law Base code	NC ZAF601040306
9. No harsh or inhumane treatment is allowed	9.E Ensure appropriate training for workers a...	Base code	NC ZAF601040310

← Contents

Management systems →

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	ⓘ	ⓘ	ⓘ	ⓘ
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	⚠	⚠	⚠	⚠
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	✓
6. Working hours are not excessive	ⓘ	ⓘ	ⓘ	ⓘ
7. No discrimination is practiced	✓	✓	✓	ⓘ
8. Regular employment is provided	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	Not addressed	Some improvements recommended	Not addressed	Not addressed
9. No harsh or inhumane treatment is allowed	Robust management systems	Robust management systems	Some improvements recommended	Robust management systems
10.A. Environment 2-Pillar	Robust management systems	Some improvements recommended	Some improvements recommended	Some improvements recommended

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

← Summary of findings

Site details →

Site details

Company and site details

Sedex company reference	ZC1012455	
Sedex site reference	ZS1089008	
Company name	Klash Clothing Co. Ltd.	
Business ownership type	GOODS	
Site name	Klash Textile (Private) Limited	
Site name in local language		
GPS location	**GPS address**	196 R.B East Ghona, Dry Port Road
	Coordinates	Latitude: 31.5105453, Latitude: 73.1084052
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Mr. Muhammad Asif
	Job title	Deputy Manager Compliance
	Phone number	+44-161-624-1892
	Email	yasirlatif@klashpvt.com

← Management systems

Worker analysis →

Company and site details

Applicable business and other legally required business license numbers and documents	> National Tax Number : 1727926 (Non-Expiry). > Labor Registration Certificate # 2024010800639 (Non Expiry). > Certificate of Incorporation # F-0733(Non-Expiry). > Chambers of Commerce Certificate : 1401996-568 (Valid till: 31-03-2026). > Civil Defense Certificate: C-75/CDOF/2025/675 (Valid till: 09-01-2026). > Building Stability Certificate: B/S/fsd.08 (Issuance Date: 10-Mar-2022) from Jers Engineering Consultants (P.E.C. # 0001003).

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Manufacture of wearing apparel (clothing), except fur apparel
	Secondary	
	Other	
Product type	Manufacturer & Exporter of Knitted and Denim Garments.	
Process overview	Products: Knitted garment. Main operations: Knitting, embroidery and complete cut to pack manufacturing unit of knitted garments. Number of production lines: 36 sewing lines. Main equipment: Knitting machines 18, Embroidery Machines: 21, Cutting Manual Cutters: 03, Fusing machines: 04, Iron Pressing machines: 08, metal detection Machines: 01, Generator: 01, compressor: 01, Zig zag machines: 80, double needle machines: 144, Flat lock Machines: 120, Overlock Machines: 276, Lock stitch Machines: 198, bar tack: 17, clipping Machines: 35, Eyelet Machines: 08, button hole Machines: 11, button attach machine: 01 and all the machines were found in good working condition.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	21372m^2

← Site details

Worker analysis →

Site scope

Building 1	**Last construction works on site**	2003
	If building is shared, provide details	Not a share building.
	Number of floors	2
	Description of floor activities	Ground floor: Finish Fabric Store LS (Loyal & Sons), Cutting + Audit LS, warehouse (LS), Stitching Unit (LS). 1st floor: Stitching Unit # 1&2&3+Finishing, Stitching Unit # 4 &5+Finishing, Stitching Unit # 6&7+Finishing
Building 2	**Last construction works on site**	2003
	If building is shared, provide details	Not a share building.
	Number of floors	3
	Description of floor activities	Ground floor: Finished fabric store, Cutting Textile, Checking, Cutting Audit + Fabric Storage, Knitting, accessories store. 1st floor: Accessories Store Stitching Unit # 8, Stitching Unit # 9+10+11 Finishing, Embroidery 2nd floor: Socks unit.
Building 3	**Last construction works on site**	2003
	If building is shared, provide details	Not a share building.
	Number of floors	1
	Description of floor activities	Ground floor: Electrical & Mechanical Workshop, boiler And Generator Area.

← Site details

Worker analysis →

Site scope

Building 4	**Last construction works on site**	2003
	If building is shared, provide details	Not a share building.
	Number of floors	1
	Description of floor activities	Ground floor: Non-Operational (Old boiler room) and old machine stacking.
Building 5	**Last construction works on site**	2003
	If building is shared, provide details	Not a share building.
	Number of floors	1
	Description of floor activities	Ground floor: Admin office, workers canteen.

Is there any difference between the site scope of the audit and the Sedex site profile?	No
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No
Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No

← Site details

Worker analysis →

Worker accommodation and transport

Does the site organise worker transport to the worksite?	Not applicable Transport is not needed, as all the workers live near the site.

Work patterns

Approximate workers on site per month (% of peak)	**January**	95-100%	**February**	95-100%
	March	95-100%	**April**	95-100%
	May	95-100%	**June**	95-100%
	July	95-100%	**August**	95-100%
	September	95-100%	**October**	95-100%
	November	95-100%	**December**	95-100%
Is there any night shift work at the site?	No			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No No, the site has not been assessed for potential negative impacts on the rights, lands, resources, or livelihoods of indigenous peoples or local communities.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No No, no Human Rights Impact Assessment (HRIA) was ever conducted on this site.

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	943	(95.3%)	47	(4.7%)	-	-	990	(100%)

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	943	(95.3%)	47	(4.7%)	-	-	990	(100%)
Temporary or fixed term employees	0	-	0	-	-	-	0	(0%)
Agency or subcontracted workers	0	-	0	-	-	-	0	(0%)
Seasonal workers	0	-	0	-	-	-	0	(0%)
Self-employed workers	0	-	0	-	-	-	0	(0%)
Informal workers including home workers	0	-	0	-	-	-	0	(0%)
Apprentices, trainees or interns	0	-	0	-	-	-	0	(0%)

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	0	-	0	-	-	-	0	(0%)
International migrant workers	0	-	0	-	-	-	0	(0%)
Total migrant workers	0	-	0	-	-	-	0	(0%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	None

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	35	*(83.3%)*	7	*(16.7%)*	-	-	42	*(4.2%)*
15 - 17 years old	0	-	0	-	-	-	0	*(0%)*
Under 15 years old	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	Yes
Please list the nationalities of all workers, with the three most common nationalities listed first	Pakistani

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Pakistani	95%	5%	-	100%

Workers by remuneration type

	Men		Women		Other		Total	
Workers paid per unit (piece rate)	-	-	-	-	-	-	0	*(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	-	-	-	-	-	-	0	*(0%)*
Workers paid hourly / daily rate	-	-	-	-	-	-	0	*(0%)*
Salaried workers	943	*(95.3%)*	47	*(4.7%)*	-	-	990	*(100%)*

* % of total workforce

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	(0%)
Paid weekly	0	-	0	-	-	-	0	(0%)
Paid monthly	943	(95.3%)	47	(4.7%)	-	-	990	(100%)
Other	0	-	0	-	-	-	0	(0%)

* % of total workforce

If other payment cycle entered, please provide details	None

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	22	(84.6%)	4	(15.4%)	-	-	26
Supervisors or team leaders	40	(76.9%)	12	(23.1%)	-	-	52
Administrative staff	18	(85.7%)	3	(14.3%)	-	-	21

← Worker analysis

Worker interviews →

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	6 group of 5 workers were privately interviewed.
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis
Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No workers have reported any significant complaints or concerns in any area.
What did the workers like the most about working at this site?	Equal opportunities Freedom of movement Hours worked, rest days or breaks Pay Training and development Work atmosphere (e.g. treatment by supervisors)
Additional comments	42 workers were selected for interview. 12 individual workers and 06 group of 05 workers. The workers were assured of confidentiality, and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They could make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give them general concerns, such as health and safety to their worker representative who would take it to the Worker Management Council.
Attitude of workers' committee/union representatives	There is no union at the facility. The Worker Representative is aware of their responsibilities and understands that they serve as a bridge between management and workers. The members of the Worker Management Council do not have any complaints of discrimination among the other employees. They can discuss the matters without having restrictions from management and meetings were conducted in an open manner.

← Worker analysis
Measuring workplace impact →

Attitude of workers

Attitude of managers	The management was supportive to the audit process. Access to workplace, documents and people was fully provided. Interviews were conducted in a private space provided. During the audit the facility has accepted all the non compliances and corrective action will be completed as per the time line.

Workers interviewed by type

	Total
Permanent workers	42
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	42

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	26	4	-	30
Workers interviewed individually	10	2	-	12

← Worker analysis
Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

← Worker interviews
Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	1.0%	-	3.0%
Last full calendar year (2024)	1.0%	2.0%	-	3.0%
Previous full calendar year (2023)	3.0%	1.0%	-	4.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	1.0%	-	3.0%
Last full calendar year (2024)	3.0%	1.0%	-	4.0%
Previous full calendar year (2023)	3.0%	1.0%	-	4.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] * (Number of available workdays in the year).

Are accidents recorded?	Yes Injury log maintained by the factory and found satisfactory. There was no major accident observed.

← Worker interviews

Code area 0 →

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%

← Worker interviews
Code area 0 →

Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

← Measuring workplace impact

Code area 0 →

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current System: 1. The Auditor with genuine and authentic records. Not offer bribes to or threaten the auditor, nor in any way induce the auditor to be dishonest. Access was given to the auditors to visit all areas under scope. Workers interviews were conducted at private place. All documents and records were available for review. 2. Facility had no issue to provide the SAQ. 3. Factory did not offer any undue advantage to Auditor. No undue pressure was applied to Auditor. Human rights policy was available for review and approved at most senior level, communicated to all personnel and trained to relevant personnel. 4. Evidence Examined: a. Policy and Procedure on Business & Human Rights document reference no: KPL/HR/12 Dated: 01-06-2025. b. Factory's code of conduct c. Social Compliance manual d. SAQ reviewed

← Measuring workplace impact
Code area 1 →

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	1. Factory has written policy on "Employment Freedom" in place. These policies are also written in the employee handbooks given to workers at the time of hiring. These policies are regularly reviewed and effectively enforced which clearly shows factory's strict commitment to adhere these policies. Policies and procedures meet the workplace requirements. All policies and procedures last review in last MRM meeting dated on 18-07-2025 and also all polices effectively enforced. Policies and procedures meet the workplace requirements. These policies and procedures are also displayed on notice board. Training records were available for review. 2. Factory's Deputy Manager Compliance (Muhammad Asif) is responsible for overseeing and implementation of recruitment and employment procedures. The Deputy Manager Compliance (Muhammad Asif) has 11 years of experience. He ensures that compliance with the policies and procedures is strictly followed. This was verified through personnel files review, worker interviews and management interviews. 3. At the time of hiring, In an orientation, social compliance training included all social & labor policies and procedures topics is provided to the new workers. Moreover, refresher social compliance training are also conducted once a year to all existing workers, supervisors and managers, last social compliance training conducted on dated: 09-07-2025. Social compliance training material was also available. However, training material is same for the training of all levels of employees. 4. The facility has an effective monitoring process that includes an annual internal audit. The last internal audit was conducted on 03.04.2025. Additionally, a Management Review Meeting (MRM) is arranged, with the most recent meeting held on 18-07-2025. Spot checks are also conducted to ensure that employment policies and procedures are effectively implemented. The Compliance Manager regularly reviews personnel files, speaks with workers during spot checks, and verifies that policies are properly enforced.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section	Current System: 1. The factory has documented policies and procedures addressing key compliance areas, all dated 01-06-2025.: * Health and Safety (KPL/HS/08) * Freedom of Association & Collective Bargaining (KPL/PAB/09) * Prohibition of Discrimination (KPL/DCL/07) * Compensation & Benefits (KPL/CMP/05) * Hours of Work (KPL/HW/06) * Prohibition of Child Labour (KPL/CL/03) * Prohibition of Forced Labour (KPL/PFL/02) * Environment (KPL/EM/10) * Prohibition of Harassment and Abuse (KPL/PHA/04) * Social Compliance (KPL/SC/001) 2. These policies are: * Included in the workers' handbook * Displayed on factory noticeboards * Reviewed annually or when required by changes in laws, customer requirements, or certifications * Last reviewed during the Management Review Meeting (MRM) on 18-07-2025 * Found compliant with legal and workplace standards 3. All policies were also reviewed in the previous MRM dated 11-06-2025 and confirmed to be effectively enforced. 4. Internal audits are conducted annually. The last audit was carried out on 03-04-2025. 5. Mr. Muhammad Asif (Deputy Manager Compliance, 11 years of experience) is responsible for: * Overseeing recruitment and employment practices * Enforcing all policies and procedures * Conducting compliance verification through personnel file checks, worker and management interviews, spot checks, and internal audits 6. All new workers receive orientation covering social and labor policies. 7. Annual refresher training is conducted for workers, supervisors, and managers. The

← Code area 0

Code area 1.A →

most recent session was held on 09-07-2025.

8. Uniform training materials are used across all levels of staff.

9. The factory prohibits all forms of forced, bonded, or involuntary prison labor. Workers sign voluntary employment confirmation upon hiring.

10. No monetary deposits or submission of original identity documents are required during hiring.

11. Resignation terms:

* 24-hour notice for probationary employees
* 30 days' notice or one-month salary in lieu for permanent employees
* These terms comply with applicable labor laws

12. Regular monitoring mechanisms include:

* Internal audits (last on 03-04-2025)
* Spot checks
* Management Review Meetings (most recent on 18-07-2025)

13. Spot checks and compliance file reviews are led by the Deputy Manager Compliance.

14. Factory tour observations:

* No signs of forced or involuntary labor
* Workers had freedom of movement
* No restricted areas found
* Security staff were performing standard duties only

15. Overtime is voluntary. No coercion or discrepancies were noted in payroll records or interviews.

16. The factory has informed suppliers of local labor law requirements and obtained written acknowledgments.

17. Verified documentation includes:

* Policies and procedures
* Employment contracts

← Code area 0
Code area 1.A →

* Worker interviews
* Training records
* Internal audit and MRM evidence

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Yes Factory have a policy named by "Prohibition of Forced Labour" ref: KPL/PFL/02 dated: 01-06-2025.
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1
Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	1. The factory has documented policies and procedures in place concerning worker recruitment and the prevention of forced labor. These policies are also included in the workers' handbook, regularly reviewed, and generally well-enforced, reflecting the factory's clear stance against forced, bonded, or involuntary prison labor. While the policies meet workplace requirements, some improvements could be made to further strengthen implementation practices and ensure ongoing alignment with best industry standards. 2. Mr. Muhammad Asif Deputy Manager Compliance effectively oversees the implementation of recruitment and employment procedures, and compliance is well-maintained, as verified through personnel file reviews and interviews. However, formal documentation of this responsibility is currently lacking. Strengthening this practice by officially recording the assigned responsibilities would further reinforce accountability and governance. 3. Orientation training is provided to workers at the time of hiring, and refresher trainings are conducted for managers and supervisors. Relevant training materials were available and found to be sufficient. However, some improvements are needed to ensure consistent training coverage across all worker levels and to enhance tracking of training effectiveness. 4. Factory has an effective monitoring process which included internal audits, Management review and spot checks to ensure that employment policies and procedures are effectively implemented. Factory Compliance Manager regularly reviews personnel files and speaks with workers for spot checks. Although, factory need to monitor the policies in more detail.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1

Code area 2 →

Systems and evidence examined to validate this code section	1. As per document review, facility management and employee interview, all employees in the facility were local nationals, Pakistani. All employees had the proper legal rights to work in this region. No migrant workers seen or reported during audit process. Factory has implemented written policy of Employment and documented procedure on it. Factory is not using any 3rd party recruitment agencies or labour providers. All workers were hired directly. No workers are required to pay any fees during the recruitment process. 2. All workers are provided with employment contract. Employment terms and conditions are provided as per local laws no requirement is in contradiction with the code and local law. Copy of the employment contract is retained in the personnel files of the workers. Factory does not hire workers under the age of 18 years for full time work. Factory reviews National Identity card or driving license to validate the workers identity. 3. The facility has implemented comprehensive measures to ensure full compliance with all requirements under Code Area 1.A regarding freely chosen employment. All workers, including those not directly hired, undergo thorough verification of their legal right to work through original photographic identification such as National IDs. The facility maintains complete records demonstrating this legal work status for every employee. During recruitment, the facility ensures complete transparency by guaranteeing that actual working conditions, employment terms, wages and benefits precisely match what was communicated to workers beforehand. 4. Factory has an effective monitoring process which included internal audits, Management review and spot checks to ensure that employment policies and procedures are effectively implemented. Factory Compliance Manager regularly reviews personnel files and speaks with workers for spot checks. Although, factory need to monitor the policies in more detail. The facility ensures adequate payment to agencies to cover legitimate recruitment costs, preventing any financial burden being shifted to workers. Regular worker interviews and surveys are conducted to verify no illegal fees or recruitment costs have been incurred. 5. Stringent contractual safeguards are in place to protect workers' rights. All service agreements hold labor providers and subcontractors fully accountable for ensuring no recruitment fees are charged to workers, with clear provisions for immediate reimbursement if violations occur. The facility has processes to verify timely reimbursement of any improper fees identified. These measures are complemented by full compliance with all applicable national labor laws and regulations. Through these comprehensive policies, verification processes and contractual controls, the facility guarantees that all employment is entered into voluntarily and meets the highest standards of ethical recruitment practices. 6. The facility ensures all workers earn at least the minimum wage without requiring excessive overtime. Working hours, rest periods, and overtime pay strictly comply with labor laws and collective agreements. Regular audits verify wage practices meet legal standards.

← Code area 1 Code area 2 →

7. No worker payments are withheld as forced savings or delayed. The facility prohibits any financial schemes that restrict employment freedom. Workers receive full wages on time without unlawful deductions.
8. Payment systems are transparent and regularly monitored. Workers can confidentially report any wage concerns through multiple channels. These practices uphold both legal compliance and ethical employment standards.
9. All policies prevent financial coercion and protect workers' rights. The facility maintains strict adherence to wage and hour regulations. This ensures fair compensation while preserving workers' freedom of employment.
Evidence Examined:
1. Policies and procedures on recruitment.
2. National Identity Cards of sampled workers
3. Personal interview of sampled workers
4. Management interview
5. Employment contracts.
6. Identity proof of workers (National Identity card, Driving License, Other documents to proof workers identity)
a. Policy on Business & Human Rights document reference no: KPL/HR/12 Dated: 01-07-2025.

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No

← Code area 1.A
Code area 2 →

Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Yes
What recruitment fees and costs do workers pay during the recruitment and employment process?	Workers do not pay any recruitment costs (Please provide details) No recruitment fees or related costs were identified as being paid by workers during the recruitment and employment process, based on documentation review and worker interviews.
Were recruitment fees or costs identified during worker interviews?	No No recruitment fees or costs identified during worker interviews.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	1. Factory had policies regarding "Freedom of Association & Collective Bargaining" Policies clearly states that workers representatives are not discriminated and have the access to carry out their activities in the workplace without any coercion from the management. Policies are also mentioned in the workers handbook. Policy was signed by top management which showed their commitment. Policies are regularly reviewed and effectively enforced. 2. Factory's Mr. Muhammad Asif Deputy Manager Compliance is responsible for overseeing and implementation of Freedom of Association and make sure that workers' rights to collective bargaining are protected. Compliance Manager ensures that compliance with the policies and procedures is strictly followed. This was verified through worker interviews, workers committee meetings records review. 3.At the time of hiring an orientation training is provided to the workers. Moreover, refresher trainings are also conducted once a year on documented policies and procedures. Training material was also available and sufficient for this purpose. These policies and meeting minutes are also displayed on notice board. Training records were available for review. 4. Factory has an effective monitoring process which included internal audits, Management review and monitoring of election process to ensure that workers right of collective bargaining is protected. This was verified through records related to election process, minutes of meetings of Worker Management Council.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1.A

Code area 3 →

Systems and evidence examined to validate this code section	1. The Management Has Documented Policies, Procedures, and Practices to Recognize and Respect the Lawful Rights of Freedom of Association and Collective Bargaining of Workers. The Policy Clearly States That the Workers Are Free to Join or Form a Union of Their Own Choice. Since the Workers Have Not Formed Any Union in the Factory, the Facility Has a Worker Management Council as per Law. A Worker Management Council Is Formed to Settle the Issues of Workers and to Convey Any Complaint/Demand to the Top Management. 2. Non-Discrimination & Access "Freedom of Association & Right to Collective Bargaining Policy" Confirms: Worker Representatives Are Not Discriminated Against. Representatives Have Unrestricted Access to Perform Their Duties Without Coercion. 3. Democratic Elections Election Notices, Results, and Photographs Were Verified in Records. Worker Management Council Were Elected for a Two-Year Term Through Voting. 4. Training & Awareness Workers Received Training on Freedom of Association and Collective Bargaining Rights on 10-07-2025. 5. Transparency & Communication Worker Representatives Are Provided Dedicated Time and Workspace. All Employees Are Informed of Representatives’ Roles and Contact Methods via Notices and Regular Communications. 6. Policy Compliance Management Guarantees No Retaliation for Freedom of Association, as Documented in Policies. Transparent Processes Are Maintained (e.g., Elected Councils, Meeting Minutes). 7. Minutes Were Displayed on the Notice Board to Ensure Communication With All Workers. Minutes of Meetings. Evidence Examined 1. Worker Representation & Council Operations

← Code area 1.A

Code area 3 →

Quarterly Meetings Minutes of Worker Management Council Were Reviewed, Including Last Meeting Conducted on 18-07-2025

2. Company’s Policy on Freedom of Association & Right to Collective Bargaining.

3. Employee Files.

4. Election Documents & Photographs.

← Code area 1.A

Code area 3 →

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Yes
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← Code area 2 Code area 3 →

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	1. Factory has written policy on "Health and safety" in place to ensure safe and healthy working environment. The policy is designed to promote the worker's health and safety. These policies are also written in the employee handbooks given to workers at the time of hiring. Their implementation is not fully effective or consistently enforced. Therefore, fundamental improvements are required in the enforcement and practical application of safety policies. 2. Mr. Muhammad Asif Deputy Manager Compliance has been appointed to implement health and safety policies, and a Health and Safety Officer is designated to oversee fire safety. However, the current job description of the Health and Safety Officer lacks adequate coverage of general safety responsibilities. Additionally, there is no clear structure for a dedicated safety team, which severely impacts the effectiveness of the health and safety management system. Fundamental improvements are needed to establish a well-defined safety team, clarify individual responsibilities, and ensure comprehensive oversight of all health and safety matters. 3. Although the factory has communicated its health and safety policies to workers, supervisors, and managerial staff, and conducts orientation and annual refresher trainings, the overall implementation remains weak. During the site tour, several safety-related issues were observed, indicating that the training provided to workers is not effectively addressing practical safety requirements. Furthermore, the factory does not retain proper pictorial evidence of fire evacuation drills. While inspection reports from Civil Defense and Labor Department have been obtained, these do not substitute for internal compliance. Fundamental improvements are required to strengthen the training program, reinforce practical awareness among workers, and ensure systematic documentation of emergency drills. 4. Although the factory has systems in place to monitor health and safety, the number and nature of non-conformities found during the audit such as blocked exits, unmounted extinguishers, missing safety guards, and non-illuminated signage demonstrate that monitoring is either insufficient or not being acted upon. This points to a failure in the feedback loop necessary for continuous improvement and risk mitigation, requiring significant enhancement of the monitoring system. Factory is monitoring Health & Safety procedures; however, it did not seem to be effective as few systemic safety related findings were noted.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 2 Code area 4 →

3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Base code	NC	ZAF601040311
	3.L Implement effective processes to manage f...	Local law Base code	NC	ZAF601040305
	3.L Implement effective processes to manage f...	Local law Base code	NC	ZAF601040307
	3.L Implement effective processes to manage f...	Local law Base code	NC	ZAF601040308
	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC	ZAF601040309
	3.O Implement an appropriate electrical safet...	Local law Base code	NC	ZAF601040306

Systems and evidence examined to validate this code section	1. The factory has appointed a team of professionals to run health and safety and compliance matters headed by Mr. Muhammad Asif Deputy Manager Compliance. 2. Health & Safety Officer who is responsible to keep all firefighting, fire-alarm and fire detections systems installed in the factory run without any trouble in the event of fire incident. 3. The compliance department is responsible to maintain all relevant certificates, permits, licenses, etc. applicable to the nature of activities being carried out in the facility. 4. Training of firefighting and first-aid team are regularly conducted by outside trainers or internally by compliance department. 5. The factory has developed and implemented all relevant policies and procedures ensure compliance to all applicable local and international laws and standards. 6. Manager Compliance & HR is responsible to maintain all relevant documents. 7.Accident/ incident reporting mechanism logs the incident its data is used for analyses and investigation to find out root causes and taking right corrective actions. 8. The facility has documented Risk assessment to reduce or eliminate risks in the facility. Internal monitoring of safety & fire arrangement carried out on weekly basis. 9. Facility has a program and materials to train relevant individuals, including all individuals responsible for the supervision of workers, on all of the relevant occupational safety and health issues. 10. Factory has a trained first aid and fire-fighting team. Team members found identified with list of their names posted in all areas. Evidence Examined: 1. During the factory tour it was observed that the facility is following the applicable laws and regulations regarding health & safety and ensuring a safe and hazard free workplace. 2. Emergency fire alarms, emergency exists, fire extinguishers, Fire buckets other firefighting equipment, first aid boxes, personal protective equipment, sanitary toilets, etc. were found in proper places and adequate quantities. 3. The facility has defined a policy for health & safety committee to deal with health and safety issues. 4. Safety program is documented and is reviewed by Health & safety committee. Detailed fire plan is also documented explaining the roles of various teams. 5. Company has provided training on PPE and Machine safety dated 09-07-2025. Training records verified during the documents review. 6. Induction training is also provided to new workers and repeated training for the reassigned workers. 7. Fire-fighting team is available that is trained on a regular basis and records maintained. Fire fighter team members were found aware of the fire-fighting procedures. 8. The facility has scheduled to conduct emergency evacuation drills on biannual basis.

← Code area 2
Code area 4 →

Records of last emergency evacuation drills reviewed detail of latest drill is as per below:
a. Announced drill, dated 08-07-2025, evacuation time recorded as 1 minutes 43 seconds.
9. First aid training conducted dated 17-06-2025, training records and material reviewed.
10. Factory's compliance staff also arranges internal trainings as per schedule to make sure those workers from all departments must get the trainings.
11. All fire extinguishers are identified by numbering system of fire extinguisher and monthly fire Extinguisher inspection records found maintained.
12. Fire alarm and first aid box fortnightly inspection reviewed.
13. No Accommodation/Dormitory facility is provided to workers.

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF601040311

Non-compliance

Due 2025-10-03

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Issue title

307 - No/inadequate noise assessment conducted

Description

Based on document review it was noted that facility has undergone 3rd party emission testing but the noise level testing report do not cover generator area.

Corrective and preventative actions

The facility should arrange for a noise assessment of the generator area to determine the level of noise exposure and ensure compliance with occupational health and safety standards.

Status

Closed (2025-08-19)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601040305

Non-compliance

Due 2025-09-03

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-08-19)*

← Code area 3

Code area 4 →

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

207 - Isolated or partial occurrence of blocked fire exits causing an elevated but not significant risk

Description

During site visit it was noted that 1 out of 2 aisles in cutting department at ground floor of building 2 was partially blocked temporarily by empty drums.

Corrective and preventative actions

The facility should implement measures to ensure that all aisles remain clear and unobstructed to comply with safety regulations and improve operational efficiency.

Local law reference

THE FACTORIES ACT, 1934 25. Precautions in case of fire.— (6) A free passage-way giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the factory.

Evidence

NC. Aisles blockage in cutting department.jpg

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601040307

Non-compliance

Due 2025-09-03

← Code area 3

Code area 4 →

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

214 - No evacuation plan or designated emergency exit route

Description

It was noted during site visit that 1 out of 2 aisle marking in the checking area on the first floor of the production building 2 were faded.

Corrective and preventative actions

The facility should repaint the faded aisle markings in the checking area to clearly define walking paths and ensure safe movement of personnel and materials. Regular monitoring and maintenance of all safety markings should be implemented to maintain visibility and compliance with safety standards.

Local law reference

THE FACTORIES ACT 1934 (Act XXV of 1934) [chapter III] Health and Safety 25. Precautions in case of fire.– (1) Every factory shall be provided with such means of escape in case of fire as may be prescribed. (4) In every factory every window, door, or other exit affording means of escape in case of fire, other than means of exit in ordinary use, shall be distinctively marked in a language understood by the majority of the workers and in red letters of adequate size or by some other effective and clearly understood sign.

Evidence

NC. Faded aisles in checking area.jpg

Status

Closed (2025-08-19)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601040308

Non-compliance

Due 2025-08-04

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.L Implement effective processes to manage fire safety including, but not limited to, accessible evacuation routes, a fire detection system, fire fighting/suppression equipment, training and regular drills covering all shifts and warning systems.

Issue title

184 - Fire fighting equipment is locked or otherwise not accessible at all times

Description

During site visit it was noted that 2 out of 6 fire extinguisher in dining area near main gate were partially blocked temporarily by chairs and a table.

Corrective and preventative actions

The facility should immediately remove any obstructions around the fire extinguisher to ensure it is fully accessible in case of emergency. Clear floor markings and signage should be placed to indicate a no-obstruction zone. Regular housekeeping checks should be conducted to maintain unobstructed access to all firefighting equipment.

Local law reference

THE FACTORIES ACT, 1934 25. Precautions in case of fire.— (8) The Government may make rules prescribing in respect of any factory, or class or description of factories, the means of escape to be provided in case of fire and the nature and amount of firefighting apparatus to be provided and maintained.

Evidence

Status

Closed (2025-08-19)*

Time given to resolve

Immediate

Verification method

Desktop audit

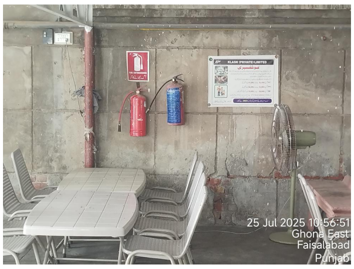
Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →



[NC. Fire extinguishers blocked in canteen.jpg]

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601040309

Non-compliance Due 2025-09-03

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-08-19)*

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Description

During site visit it was noted that 35% of overlock operators were not using shield eye guards (Plexi glass) in stitching area at 1st floor of production building 2. Although the machines are equipped with eye guards but only those identified workers were not using it.

Corrective and preventative actions

Facility shall ensure to provide refresher training to workers on machine safety.

Local law reference

In accordance with Factories Act 1934 Chapter-03 Health and Safety section 31, Casing of new machinery: (1) In all machinery driven by power and installed in any factory after the commencement of the Labor Laws (Amendment) Ordinance, 1972 (a) every set screw, belt or key on any revolving shaft, spindle, wheel or pinion shall be so sunk, encased or otherwise effectively guarded as to prevent danger.

← Code area 3

Code area 4 →

Evidence

[NC. Eye shield not used by workers at 1st floor in stitching area.jpg]

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF601040306

Non-compliance

Due 2025-10-03

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Issue title

224 - Isolated occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs

Description

It was noted during the site tour that an electrical panel near the main gate of the facility was found broken.

Corrective and preventative actions

The facility should immediately repair or replace the broken electrical panel to ensure safety and compliance with electrical safety standards. A qualified electrician must inspect the panel and complete the necessary repairs. Additionally, protective covers should be installed, and regular inspections should be scheduled to prevent recurrence.

Status

Closed (2025-08-19)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3 Code area 4 →

Local law reference

THE PUNJAB OCCUPATIONAL SAFETY AND HEALTH ACT 2019 (Act IV of 2019) Safety and Health.– (1) The Government may in consultation with the Council, by notification in the official Gazette, provide for safety and health of persons in any establishment or a class of establishments in the prescribed manner. instructions, training and supervision in relation to employment on dangerous machine and fencing or casing of machinery, wet floors, open wiring, safety escapes, emergency exits, safe electric wiring and fitting etc.

Evidence

[NC. Broken electric panel.jpg]

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes All land ownership related records were available found adequate. Organization established land right policy.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

← Code area 3

Code area 4 →

Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 3
Code area 5 →

Management systems

Explanation for management systems grades	1. Factory has written policy on Prohibition of Child Labour in place. these policies are also written in the employee handbooks given to workers at the time of hiring. Moreover, Factory has addressed to verify the age in case of suspected child and young worker in its procedure for prohibition of child labour. these policies are regularly reviewed and effectively enforced which clearly shows factory's strict commitment to adhere these policies. Policies and procedures meet the workplace requirements. 2. Factory's HR manager is responsible overseeing age verification of workers at time of hiring and make sure that no underage worker gets hired. Compliance Manager ensures that compliance with the policies and procedures is strictly followed. This was verified through personnel files, workers and management interviews. 3. At the time of hiring an orientation training is provided to the workers. Moreover, refresher trainings are also conducted once a year on documented policies and procedures. Training material was also available and sufficient for this purpose. These policies are also displayed on notice board. Training records were available for review. 4. Factory has an effective monitoring process which included internal audits, Management review and spot checks to ensure that employment policies and procedures are effectively implemented. Factory Compliance Manager regularly reviews hiring process with HR Department and reviews personnel files for spot checks and verifies that all required documents and system is in place for effective monitoring. 5. Child Labour policy: KPL/CL/03 - 01-07-2025

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 3

Code area 5 →

Systems and evidence examined to validate this code section	Current System: 1. The factory has written a policy on the Prohibition of Child Labour, also written in the employee handbooks given to workers at the time of hiring. Moreover, the Factory has a procedure to verify the age in case of suspected children and young workers in its procedure for the prohibition of child labour. 2. The factory does not practice child labour at all. To confirm this, the Factory verifies the age of the worker by seeing his original identity card prior to hiring. A copy of this card is attached to the personal file of the respective worker as a proof. 3. During Personal Files review it was noted that factory maintain workers' age proof documents of all workers properly. 4. Legal minimum age is 18 years without restrictions and 15 years with restrictions. 5. No child or young worker found in factory. 7. The youngest worker identified at the facility was 21 years old. 8. The factory has a strict policy, and a notice stating that workers under 18 are not allowed in the facility is displayed outside the main gate. There is also a clear policy that condemns child labour, and if any suspected case is identified during operations, a defined procedure is in place to address and eliminate the issue. 9. No worker below 18 years found in the factory personal records were reviewed and workers interviewed to confirm this. 10. Training is provided to workers on prohibition of child labour on 10-07-2025. Evidence Examined: 11. Personnel files including age verification documents CNIC, Educational documents and Birth certificate. 12. Policies and Procedure 13. Observation during the factory tour. 14. Workers interviews.

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	4%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	21
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

← Code area 4 Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 4 Code area 5.A →

Management systems

Explanation for management systems grades	1. Factory has documented policies and procedures in place regarding payment of wages. these policies include the key aspects about legal minimum wage, legal benefits, insurance Policies, loans and advances, types of deductions and wage slips etc. These policies are also mentioned in the workers handbook. Policies are regularly reviewed and effectively enforced Which clearly shows factory's strict policy on fair and on time compensation. Policies and procedures meet the workplace requirements. 2. Mr. Muhammad Asif Deputy Manager Compliance is responsible overseeing and implementation of these policies. Mr. Muhammad Asif Deputy Manager Compliance ensures that compliance with the policies and procedures is strictly followed. This was verified through personnel files, wage slips, workers monthly payroll and attendance records, workers and management interviews. 3. At the time of hiring an orientation training is provided to the workers. Moreover, refresher trainings are also conducted once a year on documented policies and procedures. separate trainings are conducted for supervisors and managerial staff on these policies. Training material was also available and sufficient for this purpose. These policies are also displayed on notice board and part of workers handbook. Training records were available for review. evaluation process is in place to gauge the effectiveness of training. 4. Factory has an effective monitoring process which included internal audits, Management review complains and spot checks to ensure that payment of wage policies and procedures are effectively implemented. Factory Compliance Manager regularly reviews wage slips, workers' pay roll and attendance record to verify fair and on time compensation with HR Department and reviews personnel files for spot checks and verifies that all required documents and system is in place for effective monitoring.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 4 Code area 5.A →

Systems and evidence examined to validate this code section	Current System: 1.Legal minimum wage is PKR 37,000/- per month. This is confirmed in all 42 sampled workers interview and payroll record review of 3 months 42 workers for the month of June 2025, March 2025 & January 2024 that minimum wages are in compliance with local laws. 2. As per 42 sampled workers' interviews and payroll record review this is confirmed that overtime is paid at the premium rate i.e., double than the normal wage rate, which is in compliance to local law. 3. Factory has written employment conditions in employment contract and signed by employees and factory manager. All 42 sampled workers interviews confirmed that they are familiar with employment terms & conditions and legal benefits for which they are entitled. 4. All employees receive their monthly salaries by the 7th, with 80% paid through bank transfers, 5% by cheque, and 15% in cash. 5. All sampled interviewed workers confirmed that they get the pay slips in native language prior to payment of their salaries with the details of payment. 6. Maternity leaves are paid as per the company's policy consistent to law. However, no case of Maternity Leaves found. 7. There are legal deductions like EOBI as revealed in payroll record review and 42 workers' interviews. However, there are no deductions were made for disciplinary measures as per payroll record review and workers' interview. 8. During workers' interview, it has been confirmed that they are getting 14 annual, 8 medical and 10 casual leaves on full pay and 12 weeks (90 days) maternity leaves. Leave policy and leave grant practices are in compliance to law. 9. Factory has implemented Gratuity policy in case of resignation or termination of employment of any worker records of two full and final settlement reviewed payments found in compliance with the local law requirements. 10. Factory paid bonus to the eligible workers for the financial year 2023-2024, records reviewed. Evidence Examined: 1. Payroll record of 42 workers for the month of June 2025, March 2025 & January 2024 2. Labour contracts 3. Production records (from work floors to check for discrepancies) 4. Leave records 5. Settlement records 6. EOBI (Employees Old Age Benefit Incentive) 7. Social Security for workers 8. Group Insurance Policy

← Code area 4 Code area 5.A →

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Mix of digital and other payment methods (give details) The factory pays 80% of workers through bank transfer, 5% by cheque, and 15% in cash.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	48.0
	Max hours per month	208.0

← Code area 5 Code area 5.A →

Actual required working hours	**Required hours per day**	8.0
	Required hours per week	48.0
	Required hours per month	208.0
Maximum legal overtime hours	**Max hours per day**	2.0
	Max hours per week	12.0
	Max hours per month	48.0
Actual overtime hours	**Max hours per day**	0.0
	Max hours per week	0.0
	Max hours per month	0.0
Minimum legal wage	**Min per hour**	0.0
	Min per day	1423.0
	Min per week	0.0
	Min per month	37000.0
Actual minimum wage	**Actual per hour**	0.0
	Actual per day	1504.0
	Actual per week	0.0
	Actual per month	39100.0
Minimum legal overtime wage	**Min per hour**	355.0
	Min per day	0.0
	Min per week	0.0
	Min per month	0.0

← Code area 5 Code area 5.A →

Actual minimum overtime wage	**Actual per hour**	355.0
	Actual per day	0.0
	Actual per week	0.0
	Actual per month	0.0

Wage analysis

Number of workers' records checked	126
Provide the date and details of the records	42 workers records review from June 2025, March 2025 & January 2024
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce earning above minimum wage.
Are there any bonus schemes used?	Yes Factory pay workers on gross salary every year as a bonus. Factory paid bonus to the eligible workers for the financial year 2023-2024.
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	1. The Facility complies with the legal minimum wage set by the Govt. of Punjab. All workers are paid minimum wage which shows the factory is in compliance with minimum wage regulation. a. Facility has a living wage calculation document. b. The facility uses the Anker Methodology for estimating a living wage. c. The calculated living wage amount is PKR 38500/- d. The lowest wage received by the workers in the facility is 39100/- e. Currently, the facility pays workers above the minimum wage of PKR 37,000/- During the audit, compliance with the living wage was verified through a review of wage and benefit policies and procedures, wage and benefit records, the living wage calculation, and the improvement plan. Further verification was conducted through (triangular approach) worker interviews, documentation review and discussion with the management. 2. Evidence Examined: a. Payroll Records and Wage Slips. b. Living Wage Calculation document. c. Living Wage Improvement Plan. d. Legal Minimum Wage Notification. e. Employee Interview.

← Code area 5

Code area 6 →

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	1. Factory has documented policies and procedures in place regarding working Hours. These policies undertake the regular and overtime legal working hour limits for daily, weekly and monthly working hours, moreover, also states breaks and rest day. These policies are found in compliance with local laws. These policies are also mentioned in the workers handbook. Policies are regularly reviewed and effectively enforced; however, the revision is not documented. Moreover, monitoring is part of the job of HR manager however clear instruction to do this part is not documented. 2. Factory's HR manager is responsible overseeing and implementation of these policies. HR Manager ensures that compliance with the policies and procedures is strictly followed. He is also responsible to monitor the effective implementation of these policies and procedures through personnel files, workers time in out and attendance records review. However, monitoring is part of the job of HR manager however clear instruction to do this part is not documented. 3. At the time of hiring, workers receive orientation training, followed by annual refresher trainings on documented policies and procedures, with separate sessions for supervisors and managerial staff. While training materials are available, they are generic and not tailored to specific job roles, being used uniformly for workers, supervisors, and managers. Policies are also displayed on notice boards and included in the workers' handbook, and training records are maintained for review. Although an evaluation process exists to assess training effectiveness, improvements are needed in customizing training materials to align with the distinct requirements of different roles. 4. The factory has an effective monitoring process, including internal audits, management reviews of complaints, and spot checks to ensure working hours comply with legal limits. Mr. Muhammad Asif Deputy Manager Compliance regularly reviews time-in/time-out and attendance records to verify compliance, but some improvements are needed to strengthen controls and ensure sustained adherence

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 5.A

Code area 7 →

Systems and evidence examined to validate this code section	Current System: 1. Factory has implemented Hours of Work (KPL/HW/06) Dated: 01-06-2025. 2. Time & attendance was reviewed for the months of June 2025, March 2025 & January 2024 for 42 sampled workers. Time attendance found within legal limits as factory has work in general shift of 8 hrs. 3. As per 42 sampled workers time attendance for the sample size of 3 months, it was confirmed that 7th day rest is ensured in all cases. 4. The factory uses an electronic time and attendance system that captures employee attendance through a biometric machine installed in the HR office. 5. Workers have 1 hour break (rest / meal break) as revealed in workers interviews. 6. As per 42 sampled workers' interviews this is confirmed that the overtime is voluntary. 7. Worker's consent is taken for overtime at the time of shift planning. There is no compulsion for workers to work in overtime hours. 8. The factory operates a single general shift from 09:00 AM to 06:00 PM. 9. There is no compulsion that workers to work overtime. 10. As per 42 sampled workers' interviews and payroll record review this is revealed that all festival holidays are paid in compliance to legal requirements and workers are given casual, sick and annual leaves in compliance to law. 11. Company is providing Sunday as one day off after every six consecutive days. 12. No holiday or rest day work found during the review of record. Evidence Examined: 1. Policy and Procedure for working hours. 2. Time and attendance records 3. Payroll records of 42 workers for the month of June 2025, March 2025 & January 2024 reviewed. 4. Workers' interviews 5. Employment contracts

← Code area 5.A

Code area 7 →

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	200%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Factory have a policy to pay 200% of minimum wage for overtime work.
Excluding overtime, what are the regular working hours per week for workers at this site?	48.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	1. Factory has written policy on "Prohibition of Discrimination" in place to ensure equal treatment and prevent discriminatory practices in workplace. The policy is designed to promote the equality and eliminate any form of discrimination based on race, gender, age religion, pre-hiring health checks or other protected characteristics, however equity approach should also be part of the policy. These policies are also written in the employee handbooks given to workers at the time of hiring. these policies are regularly reviewed and effectively enforced which clearly shows factory's strict commitment to adhere these policies verified during audit. 2. Factory's Mr. Muhammad Asif Deputy Manager Compliance is responsible overseeing and implementation of these policies. He is responsible to monitor all the processes having potential risks of discrimination i.e. employment policies, hiring, promotions, terminations. He ensures that these processes are done without any biasness and every worker get equal opportunities. Mr. Muhammad Asif Deputy Manager Compliance is also responsible to look after and timely resolved the grievances received by the workers. 3. Factory communicated its anti-discrimination policies to all workers, supervisors and managerial staff to make them aware for their roles and responsibilities in order to implement these policies and procedures. The At the time of hiring an orientation training is provided to the workers. Moreover, refresher trainings are also conducted once a year on documented policies and procedures. Training material was also available however, equity approach should also be mentioned in training material sufficient for this purpose. These policies are also displayed on notice board. Training records were available for review. Last training was provided on: 10-Jul-2025. 4. The factory has established a monitoring process that includes internal audits, management reviews, and spot checks to support the implementation of antidiscrimination policies and procedures. The Compliance Manager regularly engages with the HR department to review hiring processes, personnel files, recruitment practices, wage records, working hours, and grievances received. While these efforts reflect a structured approach, some improvements are needed to further strengthen the system. For example, enhancing documentation practices and increasing the frequency of spot checks could improve the effectiveness of monitoring. Although the factory was found to be in compliance during the SMETA audit, continuous improvement is recommended to maintain robust oversight.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 6

Code area 8 →

No findings

Systems and evidence examined to validate this code section	Factory has a written discrimination policy mentioned in social compliance manual and displayed at entrance of production floor. 1. The facility had a system of professional development of their employees & staff based on character, attendance & involvement in various training programs etc. 2. Factory is an equal opportunity employer and does not discriminate, based upon gender, religion, cast, ethnic origin etc. Same was confirmed during workers and management interviews and during documentation review. 3. Factory does not require any tests prior to employment like pregnancy tests or virginity tests etc. 4. The factory has hired about 10 female workers. 5. Separate toilets and rest areas are provided for female workers. 6. There are no apparent concerns with regard to discrimination in any form at the facility. It was observed that promotion & training opportunity is based on the worker's willingness and competency. a. The factory have a policy on Discrimination named by "Prohibition of Discrimination" ref: KPL/DCL/07 - Dated: 01-07-2025. Last training was provided on: 10-07-2025. b. The facility has a dedicated equity approach in recruitment, training, development, and promotion processes. 7. Further all the interviewed employees reported that they are treated with dignity and respect and they receive same and similar treatment like other workers. 8. The facility had a system of professional development of their employees & staff based on character, attendance & involvement in various training programs etc. 9. There are no apparent concerns with regard to discrimination in any form at the facility. It was observed that promotion & training opportunity is based on the worker's willingness and competency. The facility has a dedicated equity approach in recruitment, training, development, and promotion processes. 10. Further all the interviewed employees reported that they are treated with dignity and respect and they receive same and similar treatment like other workers. 11. The facility had a system of professional development of their employees & staff based on character, attendance & involvement in various training programs etc. Policies, payroll records and employee files were reviewed to verify that there are no instances of discrimination on site. Evidence Examined: 1. Policy and Procedure on prohibition of Discrimination and maternity benefits. 2. Wages records of male & female. 3. Hiring & employment documents 4. Training Records

← Code area 6

Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	2%
Representation of women in managerial roles (ratio of women workers to women managers)	8%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	25%
Three most common nationalities in managerial and supervisory roles	100% of Pakistani Nationals.

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	1. Factory has written policy on Employment and documented procedure on it. These policies are also written in the employee handbooks given to workers at the time of hiring. these policies are regularly reviewed and effectively enforced which clearly shows factory's strict commitment to adhere these policies verified during audit. Policies and procedures meet the workplace requirements. 2. The factory has appointed Mr. Muhammad Asif Deputy Manager Compliance, holding sufficient seniority and authority to oversee the implementation of procedures ensuring regular employment is provided. He is responsible for managing and monitoring all employment-related processes, including the issuance of appointment letters, drafting and maintaining worker contracts, and ensuring all employment practices comply with applicable labor laws and company policies. He also ensures continuity of employment through proper contract management, updates employment policies as needed, and provides necessary guidance to HR staff to maintain fair, transparent, and legally compliant employment practices across the facility. 3. Factory communicated its employment policies to all workers, supervisors and managerial staff to make them aware for their roles and responsibilities in order to implement these policies and procedures. At the time of hiring an orientation training is provided to the workers. Moreover, refresher trainings are also conducted once a year on documented policies and procedures. Training material was also available and sufficient for this purpose. These policies are also displayed on notice board. Training records were available for review. 4. Factory has an effective monitoring process which included internal audits, Management review and spot checks to ensure that anti-discrimination policies and procedures are effectively implemented. As a part of monitoring Mr. Muhammad Asif Deputy Manager Compliance regularly reviews hiring process with HR Department and reviews personnel files for spot checks, recruitment practices, wage records, working hours, grievances received to verifies that all required documents and system is in place for effective monitoring.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 7

Code area 8.A →

Systems and evidence examined to validate this code section	Current Systems: 1. Factory has implemented written policy of Employment and documented procedure on it. 2. There was no home working from the site. 3. The factory has no contract workers, all workers are permanently employed and paid monthly salary according to the local labour laws. 4. Factory has signed employment contracts with workers. 5. All contracts are in local language understood by the worker. The HR department reads the contents of the contract for those workers who are unable to read it before getting it signed. Evidence Examined: 1. Policy and Procedure 2. Personal Files 3. Appointment letter 4. Social security, EOBI and Group Insurance schemes contributions

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

← Code area 8 Code area 8.A →

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Not Addressed
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Not Addressed
Monitor the effectiveness of procedures to meet policy and workplace requirements	Not Addressed

← Code area 8

Code area 9 →

Management systems

Explanation for management systems grades	1. Factory does not have written policy on "Sub-contractors and home workers" in place. Factory does not subcontract any of its process and home workers are also not used by factory. 2. The factory's Production General Manager is informally responsible for overseeing subcontracting and homeworking; however, he is not formally designated for this role. This lack of formal assignment creates ambiguity and weakens accountability. A clearly defined and documented responsibility must be established to ensure effective control, monitoring, and compliance related to subcontracting and homeworking practices. 3. The factory does not communicate any policies regarding subcontractors and home workers to its employees. While the factory currently does not engage in subcontracting or use home workers, the absence of a formal communication policy represents a critical gap. Clear policies must be developed and communicated to all employees to ensure awareness and preparedness in case subcontracting or homeworking arrangements are introduced in the future. 4. The factory lacks any formal mechanism to monitor subcontractors and home workers. Although the factory currently does not subcontract any processes or utilize home workers, the absence of a monitoring framework indicates a serious weakness in the management system. It is essential to establish a proactive monitoring mechanism to ensure due diligence, compliance, and readiness for potential future changes in operations.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 8

Code area 9 →

Systems and evidence examined to validate this code section	Current Systems: The factory does not practice homework process and as per the management interviews, outsource practices are also not required. No production process is subcontracted by the factory. Evidence Examined: 1. Company Policy & procedures 2. Production records 3. Material in & out Records at gate. 4. Site tour (Calculation on total production and estimated capacity) 5. Materials in/out records 6. Management interview 7. Worker's interview

← Code area 8

Code area 9 →

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No No use of homeworkers by suppliers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No N/A

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

[← Code area 8.A](#) [Code area 9 →](#)

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	1. Factory has written policy on "Anti Harassment and Abuse" in place. The policy is designed to protect the workers from any kind of Verbal, mental or physical coercion and provide healthy workplace environment. These policies are also written in the employee handbooks given to workers at the time of hiring. these policies are regularly reviewed and effectively enforced which clearly shows factory's strict commitment to adhere these policies verified during audit. Policies and procedures meet the workplace requirements. 2. Mr. Muhammad Asif Deputy Manager Compliance is responsible overseeing and implementation of these policies. He is responsible to monitor all the processes having potential risks of discrimination i.e employment policies, hiring, promotions, terminations. He ensures that these processes are done without any biasness and every worker get equal opportunities. Compliance manager is also responsible to look after and timely resolved the grievances received by the workers. 3. Factory communicated its anti-discrimination policies to all workers, supervisors and managerial staff to make them aware for their roles and responsibilities in order to implement these policies and procedures. The At the time of hiring an orientation training is provided to the workers. Moreover, refresher trainings are also conducted once a year on documented policies and procedures. Training material was also available and sufficient for this purpose; however, training material should be different as per their job responsibilities. These policies are also displayed on notice board. Training records were available for review. 4. Factory has an effective monitoring process which included internal audits, Management review and spot checks to ensure that anti-discrimination policies and procedures are effectively implemented. As a part of monitoring Mr. Muhammad Asif Deputy Manager Compliance regularly reviews hiring process with HR Department and reviews personnel files for spot checks, recruitment practices, wage records, working hours, grievances received to verifies that all required documents and system is in place for effective monitoring.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
9. No harsh or inhumane treatment is allowed	9.E Ensure appropriate training for workers a...	Base code	NC ZAF601040310

← Code area 8.A

Code area 10.A →

Systems and evidence examined to validate this code section	Current Systems: 1. Factory has written policy on disciplinary practices. Verbal, mental or physical coercion is absolutely prohibited as also confirmed in workers interviews and documentation review. 2. Factory has formal written procedure on Disciplinary Practices which is posted in factory and workers / supervisors and managers are familiar with procedure. 3. As per Factory's system record are kept of any disciplinary actions however no such incident reported or recorded by factory management and workers. 4. Workers have right to appeal in case of any disciplinary actions which is clearly mentioned in disciplinary actions procedure also. Mr. Muhammad Asif Deputy Manager Compliance is responsible to implement and monitor company policy and procedures on prohibition of harassment and abuse. 5. Training on prohibition of harassment and abuse was given to workers on 10-07-2025. Evidence Examined: 1. Company Policy & Procedures 2. Workers Interviews 3. Walk through of the factory. 4. Training Records 5. Workers Representative Interviews 6. Employee Files

← Code area 8.A

Code area 10.A →

Findings: non-compliances

ZAF601040310

Non-compliance

Due 2025-10-03

Code area

9 No harsh or inhumane treatment is allowed

Workplace requirement

9.E Ensure appropriate training for workers at all levels in roles where risk has been identified and those with relevant supervisory or administrative responsibilities, to prevent harsh or inhumane treatment in the workplace. Have systems in place to monitor the understanding/implementation of the training.

Issue title

942 - There is no or insufficient training programme in place to prevent harsh or inhumane treatment in the workplace, or key members of staff have not received the training

Description

Based on documents review and worker interview it was noted that facility has not provided training to workers on preventing harsh or inhumane treatment in the workplace.

Corrective and preventative actions

The facility should develop and implement a training program focused on preventing harsh or inhumane treatment, including topics such as respectful communication, disciplinary procedures, and grievance handling. This training should be conducted for all employees, especially supervisors and managers, and documented accordingly. Regular refresher sessions should also be scheduled to reinforce awareness.

Status

Closed (2025-08-19)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 10:24 (UTC) on 19 Aug 2025. View this finding on the Sedex platform for live updates and closure details.

← Code area 9

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
What type of grievance mechanism(s) are available?	Complain/Suggestion box. Grievance Policy and Procedure. Open Door Policy. Worker Management Council
Number of grievances raised in the last 12 months	5
Number of grievances resolved in the last 12 months	5

← Code area 9

Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 9

Management systems

Explanation for management systems grades	1. Factory has written policy on "Environment" in place. These policies are also written in the employee handbooks given to workers at the time of hiring. these policies are regularly reviewed and effectively enforced which clearly shows factory's strict commitment to adhere these policies verified during audit. The facility has Environmental management system in place as per nature of its operation to comply with local laws regulations. Policies and procedures meet the workplace requirements. 2. The factory has assigned the Deputy Manager Compliance to oversee the Environmental Management System (EMS) in addition to core compliance responsibilities. While this arrangement provides essential oversight, the combined responsibilities may impact the depth and effectiveness of EMS implementation. To enhance environmental performance and ensure focused execution of environmental policies and procedures, it is recommended that the factory strengthen its EMS function by allocating additional support or resources specifically for environmental management tasks. 3. The factory has communicated its environmental policies to workers, supervisors, and managerial staff through trainings and notice boards. While training programs on environmental laws, chemical handling, waste management, and material safety are available and documented, the content and delivery could be more comprehensive and inclusive. The current training approach lacks depth in some areas of the code and may not fully equip employees with a thorough understanding of their roles and responsibilities. Enhancing the training content and ensuring periodic refresher sessions could strengthen overall awareness and compliance. 4. Environmental responsibilities, such as waste disposal and emissions monitoring, are currently being managed by the factory’s Management Representative along with other duties. While these activities are being performed, there is room to improve environmental performance by enhancing focus and resources. It is recommended that the factory strengthen its environmental management system by either allocating more time or support staff to these responsibilities or gradually moving towards assigning clearer roles and increased focus on environmental initiatives within the existing team.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 9

Systems and evidence examined to validate this code section	Current System: 1. The facility has Environmental management system in place as per nature of its operation to comply with local laws regulations. Training programs are available on environmental laws, Chemical safety and handling, waste management and material safety. Training records verified. 2. The facility has contracted professional waste disposal companies to dispose of medical and solid waste. The facility has gaseous emission monitoring records of it stand by power generator. The facility has conducted Environment significant aspect identification survey to develop an environmental management system. 3. Solid waste was identified and segregated as per solid waste management program. 4. Local laws and regulations displayed on the notice board. As applicable to the facility processes, the management communicates to the employees the relevant local environmental laws and regulations through awareness sessions. 5. company's Policy and Procedure of Environment. Evidence Examined: •. Policy and Procedure of Environment ref: KPL/EM/10 - 01-07-2025.

← Code area 9

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	Not Applicable.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

← Code area 10.A

Attachments

[1. Main gate.jpg]

[2. Name plate.jpg]

[3. Parking area.jpg]

[4. Building view.jpg]

[5. Inner view.jpg]

[6. Centralised fire alarm system.jpg]

[7. Attendance device.jpg]

[8. Admin office.jpg]

[9. Keybox.jpg]

[10. Waste area.jpg]

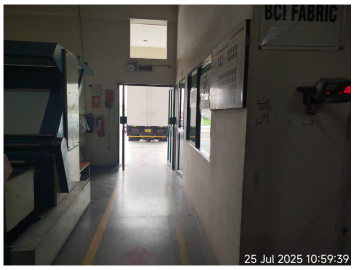
[11. Assembly area.jpg]

[12. Fire Buckets.jpg]

[13. Walkway.jpg]

[14. Fabric storage area.jpg]

[15. Smoke detector.jpg]



[16. Emergency exit.jpg]

[17. Fire alarm.jpg]

[18. Evacuation plan.jpg]

[19. Fire hose reel.jpg]

[20. Cutting.jpg]

[21. Pressing.jpg]

[22. Stitching.jpg]

[23. Threading.jpg]

[24. Fire extinguisher.jpg]

[25. Notice board.jpg]

[26. Using PPE's in cutting.jpg]

[27. Checking.jpg]

[28. Packing.jpg]

29. Finished goods.jpg

30. Knitting.jpg

31. Drinking water point.jpg

32. Eye wash area.jpg

33. Embroidery.jpg

34. Toilet.jpg

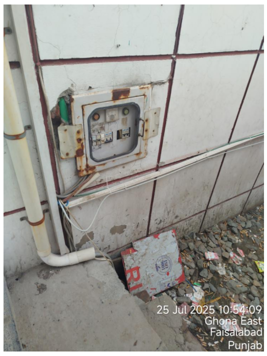
35. Ladies restroom.jpg

36. Complain and suggestion box.jpg

37. Generator.jpg

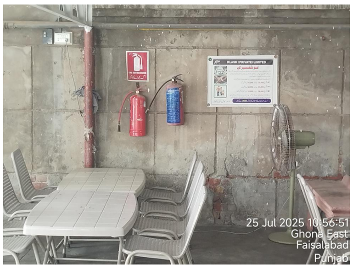
38. Accessories store.jpg

39. NC1. Aisles blockage in cutting K7.jpg



40. NC2. Broken electric panel.jpg

[41. NC3. Aisles blockage in Finished goods area.jpg]



[42. NC4. Fire extinguisher blocked in canteen.jpg]

[43. NC5. Eye shield not used by workers at 1st floor in stitching area.jpg]

[44. Signed CAPR_ZAA600145909.pdf]